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9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 JEREMY DOSIER,
16 Defendant.

CASE NO. 2:20-CR-00173-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: June 3, 2021
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

- 20 1. By previous order, this matter was set for status on June 3, 2021.
21 2. By this stipulation, defendant now moves to continue the status conference until August
22 19, 2021, at 9:30 a.m., and to exclude time between June 3, 2021, and August 19, 2021, under Local
23 Code T4.
24 3. The parties agree and stipulate, and request that the Court find the following:
25 a) The government has represented that the discovery associated with this case
26 includes over 150 pages of reports and photographs. All of this discovery has been either
27 produced directly to counsel and/or made available for inspection and copying.

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1 b) Counsel for defendant needs additional time conduct independent factual
2 investigation, review the evidence with her client, meet with her client to discuss the evidence,
3 case strategy, resolution options, and sentencing ranges, and otherwise prepare for trial.

4 c) Counsel for defendant believes that failure to grant the above-requested
5 continuance would deny her the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of June 3, 2021 to August 19, 2021,
13 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
14 because it results from a continuance granted by the Court at defendant's request on the basis of
15 the Court's finding that the ends of justice served by taking such action outweigh the best interest
16 of the public and the defendant in a speedy trial.

17 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
18 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
19 must commence.

20 IT IS SO STIPULATED.

21 Dated: June 1, 2021

PHILLIP A. TALBERT
Acting United States Attorney

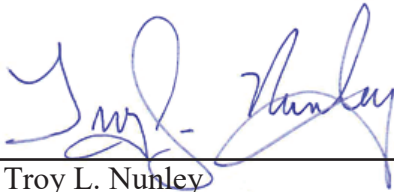
23 /s/ CAMERON L. DESMOND
24 CAMERON L. DESMOND
Assistant United States Attorney

25 Dated: June 1, 2021

26 /s/ LINDA ALLISON
27 LINDA ALLISON
Counsel for Defendant
28 JEREMY DOSIER

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 2nd day of June, 2021.



Troy L. Nunley
United States District Judge